STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF CLARENDON

CIVIL ACTION NO: 2024-CP-14-00512

Tony Carter, Individually, and as President/CEO of T. Carter Logging, Inc., and T. Carter Logging, Inc.,

Plaintiffs,

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PLAINTIFFS' RESPONSE TO DEFENDANT LORENZO YANNIEL VEGA'S REQUEST FOR ADMISSION

Lorenzo Yanniel Vega; SPS Elite LLC; and Spirit Logistics Network, Inc.,

Defendants.

TO: RONALD B. DIEGEL, ESQUIRE AND WILLIAM E. HESSE, ESQUIRE ATTORNEYS FOR DEFENDANT, LORENZO YANNIEL VEGA:

1. Please admit that the Plaintiffs are not now seeking, nor will they ever seek, in excess of \$75,000.00, inclusive of actual and punitive damages, as a result of the incident alleged in Plaintiffs' Complaint.

RESPONSE: DENIED

SMITH AMMONS, LLC.

Joshua T. Howle SC Bar #100642

614 W. Palmetto Street

Florence, South Carolina 29501

(843) 407-1583

jhowle@smithammonslaw.com Attorney for Plaintiff

February <u>12</u>, 2025

Florence, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF CLARENDON CIVIL ACTIO

Tony Carter, Individually, and as President/CEO of T. Carter Logging, Inc., and T. Carter Logging, Inc.,

Plaintiffs,

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Lorenzo Yanniel Vega; SPS Elite LLC; and Spirit Logistics Network, Inc.,

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IN THE COURT OF COMMON PLEAS

CIVIL ACTION NO: 2024-CP-14-00512

CERTIFICATE OF SERVICE

I, the undersigned employee of the law offices of Smith Ammons, LLC, attorneys for Plaintiffs, do hereby certify that on this 2 day of February 2025, I have served a copy of the foregoing Plaintiffs' Responses to Defendant Lorenzo Yanniel Vega's Request for Admission to Plaintiffs, in connection with the above-referenced case by mailing a copy of the same by United States Mail, postage prepaid, or email to the following:

Jeffrey M. Crudup, Esquire Clarkson, Walsh & Coulter, PA 497 St. Andrews Blvd Charleston, SC 29407

Ronald B. Diegel, Esquire and William E. Hesse, Esquire PO Box 6648 Columbia, SC 29260

Melissa H. Phillips

Paralegal to Joshua T. Howle